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Attorneys for Defendant
SANTA ROSA CITY SCHOOL DISTRICT

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JANE DOE NO. 59,

Plaintiff,

v.

SANTA ROSA CITY SCHOOLS,

Defendants.

AND RELATED CROSS-ACTION.

Case No. 3:16-cv-01256-WHO

**STIPULATION AND ORDER TO CONTINUE
FACT AND EXPERT DISCOVERY CUTOFF**

Hon. William H. Orrick

STIPULATION

Defendant SANTA ROSA CITY SCHOOLS (the "DISTRICT") and plaintiff JANE DOE NO. 59
by and through their respective attorneys of record, hereby stipulate as follows:

1. The Court originally assigned a Fact Discovery cutoff date of February 14, 2017. The
Parties requested additional time to complete discovery on February 13, 2017. The Court granted the
parties proposed stipulated Fact Discovery cutoff date of April 10, 2017.

2. Both parties require additional time to complete discovery. Trial is set for August 14,
2017.

3. The DISTRICT intends to conduct the following further discovery: (1) depose the officers

involved in the incident. DOE intends to conduct the following further discovery: (1) depose Defendant's District Representative(s) in accordance with Rule 30(b)(6), and (2) depose Lindsey Apkarian.

4. The parties therefore respectfully request that the Court extend the Fact Discovery cutoff date 14 days to April 24, 2017. This extension will not affect the trial date or any other dates previously set by the Court. The parties' stipulation of extending the Fact Discovery cutoff is contingent on such an extension not affecting the trial date.

5. Further, Defendant's expert is unable to provide a written report until April 28, 2017. The parties respectfully request that the Court extend the Expert Discovery deadlines 14 days as follows: (1) Expert Disclosure: April 28, 2017. This extension will not affect the trial date or any other dates previously set by the Court. In fact, the parties' stipulation of extending the Discovery cutoff is contingent on such an extension not affecting the trial date.

10. The parties respectfully request that the Court approve this stipulation and incorporate its terms in an Order.

Dated: April 10, 2017

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

By: /s/ Ethan Lowry
Eugene B. Elliot
Ethan M. Lowry
Kate L. Brown
Attorneys for Defendant
SANTA ROSA CITY SCHOOL DISTRICT

Dated: April 10, 2017

HERMAN LAW

By: /s/ Arick Fudali
Arick Fudali, Esq. (Calf. Bar No. 296364)
Daniel G. Ellis, Esq. (Calf. Bar No. 298639)
Attorneys for Plaintiff
JANE DOE NO. 59

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Dated: April 10, 2017

Ethan M. Lowry

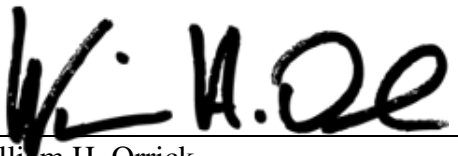
1 **ORDER**

2 GOOD CAUSE APPEARING THEREFORE, and the parties' having stipulated to the same, the
3 parties' stipulation is hereby APPROVED. The Fact Discovery cutoff currently set for April 10, 2017 is
4 continued 14 days to April 24, 2017. This extension will not alter or affect the trial date or any other
5 dates previously set by the Court.

6 Expert Discovery deadlines are continued 14 days as follows: (1) Expert Disclosure: April 28,
7 2017. This extension will not affect the trial date or any other dates previously set by the Court.

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9 **IT IS SO ORDERED.**

10 Dated: April 10, 2017

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13 William H. Orrick
14 UNITED STATES DISTRICT JUDGE
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